
Fingerprints and Photographs

A Manual to Establish Services by
Voluntary Agencies and Other
Nonprofit Groups



Prepared by
INS Outreach Program
M-297
1990

FINGERPRINTING AND PHOTOGRAPHIC SERVICES

A Manual to Establish Services by Voluntary Agencies

and

Other Nonprofit Organizations

Prepared by:

**OUTREACH PROGRAM
Immigration and Naturalization Service
Central Office
Washington, DC**

1990

TABLE OF CONTENTS

	PAGE
I. Introduction	5
II. Mutual Cooperation Between INS and Voluntary Counseling Agencies	7
III. Services Provided by Voluntary Counseling Agencies	9
A. Fingerprinting	
B. Photographing	
C. Screening	
D. Forms Distribution	
IV. Authority to Establish a Fingerprinting and/or Photographic Facility	11
V. Equipment and Supplies Requirements	13
VI. Reporting Requirements	27
VII. Procedures for Submission of Proposal by Voluntary Counseling Agency	29
VIII. INS Processing of Voluntary Counseling Agency Proposal	31
IX. Appendices	
A. 8 CFR Part 332C	35
B. 8 USC 1443(g)	41
C. Administrative Manual 2821.01	45
D. Administrative Manual 3003.01	49
E. Legal Opinion No. 81-1	53
F. Sample Financial Statement	57
G. Sample Contractual Agreement	63
H. Sample VOLAG Proposal	67

I.	Instructions for Taking Fingerprints	71
J.	Photograph Instructions	81
K.	Sample District Director Letter Soliciting Proposals	87
L.	Sample Letter Notification of VOLAG Selection	91

I. Introduction

In 1983 the Immigration and Naturalization Service began a pilot Voluntary Agency (VOLAG) Desk Project in conjunction with the nonprofit immigration counseling agencies in Houston, Texas. The purpose of the project was to provide screening, fingerprinting, and photographic services to the general public who visit the Houston INS District Office seeking information regarding requirements of immigration and nationality laws.

The Houston VOLAG desk effort was assessed as successful by both the Service and the voluntary agencies involved. The project has since been expanded to several other INS offices including San Antonio, Texas; Washington, D.C. (Arlington, Virginia); Newark, New Jersey; Hartford, Connecticut; Denver, Colorado; and El Paso, Texas.

This booklet presents an overview of how the program operates in several locations, a survey of equipment needed and description of the financial arrangements made in a model office. It will also serve as an information guide for INS district offices and voluntary counseling agencies interested in establishing a program in their locality.

For their assistance in documenting the activities in their area, the INS Outreach Program would like to offer special thanks to District Directors Richard Casillas, San Antonio; James Pomeroy, Newark; Alfred Guigni, El Paso; John Weiss, Officer-in-Charge, Hartford; and former District Directors Paul O'Neill, Houston, and Robert Neptune, Washington, DC. In addition, we would like to commend Stanley McKinley, Eastern Regional Commissioner, for his initiative in encouraging all Eastern Region District offices to become involved in the fingerprinting/photographic effort.

Update: As the manual went to press, the voluntary agency desk located in the Newark INS District Office was scheduled to relocate outside Service premises. The volag fingerprinting/photographic operation in Houston has moved into a facility nearby the INS District Office.

II. Mutual Cooperation Between INS and Voluntary Counseling Agencies

In times of budget cutbacks, both the Service and voluntary counseling organizations (VOLAGs) realize that mutual cooperation in various immigration initiatives is vital in insuring that those seeking immigration information at INS offices are serviced as efficiently as possible.

Among these initiatives is the setting up of fingerprinting/photographic facilities at INS offices. INS is particularly interested in establishing this project because:

1. It saves officer time. INS personnel are free to do adjudicative/investigative work. In areas where INS has to do fingerprints due to unavailability of other resource, an INS officer does fingerprinting. In some areas the police departments refuse to take fingerprints for INS purposes.
2. The rejection rate is reduced when VOLAGs take fingerprints/photos since they are trained by INS. In participating facilities the amount of return appointments necessary for resubmission of incorrect fingerprints and photographs has been cut significantly, thus relieving clerical staff of the need to reschedule cases to assist in one-step processing.
3. Relationships with VOLAGs are built and thus doors open for other INS-VOLAG cooperative efforts.
4. It reduces waiting lines at the district office. Routing applicants to a VOLAG facility for fingerprints/photos when these are the only items remaining to complete the process is more efficient than referring them outside the building to return another day.
5. It improves the INS image. Since the applicant is able to complete the application by a service provided in the INS facility, complaints are reduced. District offices visited believe that this project does not encourage traffic into the INS facility since the applicant is already there to submit a petition/application.
6. It results in a cost savings to INS and the general public.

Voluntary counseling organizations and other nonprofit groups are interested in beginning or continuing to provide these services because:

1. INS provides start-up equipment and office space.
2. INS provides training in fingerprinting, photographing and procedures governing the use of the most common immigration forms.
3. Voluntary agencies can use the nominal payments received for the services rendered to augment their immigration programs.
4. Voluntary agencies can assist their clients in completing immigration packets (except for medical) at their own offices with the training they receive from INS without having to refer them to other agencies. This cuts down on the need to reschedule for follow-up purposes, reducing VOLAG processing time.

During the first 50 days of operation, the VOLAG desk staff at the Washington District office assisted 15,894 persons, a daily average of 318. Services provided during this period were limited to screening, forms distribution and fingerprinting. Since that time photographic services have been added, and the statistics have risen to approximately 350 persons assisted on a daily basis.

III. Services Provided by Voluntary Counseling Agencies

- A. Fingerprinting: All applicants between ages 14 and 79 not under exclusion or deportation proceedings are required to submit Form FD-258 (Fingerprint Chart) in support of most INS applications. O.I. 105.9(c) allows for fingerprinting to be done by Service outreach centers and charitable, voluntary agencies. Moreover, it requires that those who maintain a supply of fingerprint charts for public use should be kept supplied. Therefore, Service offices with VOLAG desks should make sure that the project is always stocked with sufficient INS forms.

Taking accurate fingerprints is crucial to the processing of applicants for immigration benefits. Failure to take legible prints will result in processing delays.

Under this program, the Service may train the VOLAG desk staff or may coordinate fingerprint training with the Federal Bureau of Investigation. In addition, VOLAGs may obtain a video tape presentation prepared by the F.B.I. by writing the INS Outreach Program, 425 I Street, NW, Room 2108, Washington, D.C. 20536.

Instructions for taking fingerprints may also be found in Appendix I of this manual.

Proficiency requires minimal training and extensive practice. Usually expertise in fingerprinting can be gained in one week to one month.

- B. Photographing: Every applicant, regardless of age, is required to submit photographs in support of most INS applications, including those for permanent residence and naturalization. If the applicant lacks the photographs, he or she can have them taken at the INS office VOLAG desk. Specifications and instructions for photographs are found in Appendix J of the manual.

To gain proficiency in taking photographs, the VOLAG will need more training and practice, unless of course the person is already a photographer. Developing a photography skill, to take pictures that comply with INS specifications, may take one or more months.

- C. Screening: The VOLAG may be required to screen all applicants coming to the district office. This will work best if the desk is situated in the same office space with the information unit. In providing screening services for the district office, the VOLAG desk personnel are required to speak with every person coming to the district office, determine the person's need and, if able, respond to the inquiry. If the screener cannot respond to the question, he/she will refer the individual to an information officer. If the applicant requires assistance in completing an INS form, the screener will refer him/her to a list of voluntary immigration counseling agencies in the area. Depending on the level of immigration experience of the screener, INS will have to provide as much training in all aspects of immigration law as necessary including: the INS structure, local procedures, INS regulations, policy and operations instructions and the use of the most commonly used INS forms. This training can be accomplished in a formal setting with 80 hours of instruction and approximately one to three month's on-the-job training. This depends on the screener's experience and expertise in immigration law and procedures.
- D. Forms Distribution: The most commonly used INS forms may be distributed by the screener after training has been provided by INS in the use of the forms. It is recommended, however, that this service not be provided until the VOLAG desk staff has become proficient in taking fingerprints and photographs and has become familiar with the district office procedures. One month of operation, coupled with the forms training, is probably sufficient.

Keep these goals in mind:

1. A flexible system for supplying VOLAGs with the necessary forms should be established.
2. The Service should not box itself into one system for supplying forms to the VOLAGs. Be flexible. If supervised properly, this could be the most cost-efficient part of this project, since the VOLAG desk will be relieving the information officer of a time-consuming workload.

IV. Authority to Establish Fingerprinting/Photographic Services

The ability of the INS to establish a fingerprinting and photographic operation by a nonprofit organization is contained in Title 8, Code of Federal Regulations, Part 332c, and is statutorily sanctioned in Sections 103 and 332(g), INA, as amended; 8 USC 1103 and 1443(g). Copies of these regulations are contained in Appendix A, B, and C.

The regulations authorize the Service to enter into contracts with nonprofit organizations to establish and operate fingerprinting and photographic services in INS facilities for the benefit of persons seeking to comply with the requirements of immigration and naturalization laws.

V. Equipment and Supplies Needed

In the initial stages of the fingerprint/photographic project, the Service will attempt to provide supplies, if available, to the voluntary agency. Within the first year of operation, the VOLAGs are expected to purchase their own equipment.

INS should provide approximately 150 square feet of space located in the INS office for the fingerprint/photograph operation. This may be leased space physically located in the processing area or in a separate area in the same INS facility. INS will initially provide to the voluntary agency the following items: One camera (if available), two desks, a safe or locking storage cabinet, a fingerprinting kit, wash/wipe cloths, chairs and miscellaneous supplies.

The VOLAG will provide personnel to do fingerprinting and photographing (some VOLAGs use one person, plus a back-up person trained to do processing on days when the primary person is unable to work; other offices employ two persons). Approximate processing time for photographing is two minutes. Fingerprinting is about the same time. Some VOLAGs may also assist INS in processing the ADIT card with a thumb-print.

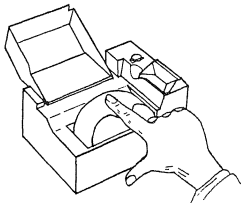
Fingerprinting Devices

The Print-Master Fingerprint Inker is the recommended piece of equipment for fingerprinting. Good results can also be obtained using the PORELON PAD.

The main points to remember when using these devices are:

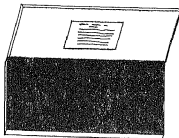
Print-Master Fingerprint Inker:

1. The Print-Master device does a very effective job of inking the finger; therefore, when taking the print the fingerprinter must use very light pressure to avoid smearing or smudging the fingerprint.
2. Manufacturers instructions pertaining to ink types, ink level, and care of the pillow must be followed.



Porelon Fingerprint Pad:

1. Porelon pad must be closed when not in use to protect it from drying out.
2. When using an older Porelon pad, take care to get sufficient ink on the finger, but when taking the actual print, avoid excessive pressure so that the print does not smear or smudge.
3. Porelon pads cannot be reinked. Once they become too dry, they must be discarded. These pads may be obtained from GSA. The Federal Stock number is number is 7520-00-117-5627.



Cleaning Material:

Before and after the fingerprint is taken, clean the finger with cleaning pads such as Dermi-klene, Dinky Pads, etc., and dry with paper or cloth towels.

Photographing Equipment

At certain locations, the ADIT Program has provided photographing equipment to enable the field offices to obtain the alien's photograph required for the I-551 and I-586. This section lists that equipment and specifies how the equipment must be set up for acceptable results. The main reliance is on the photo supplied by the alien.

Required photographing equipment:

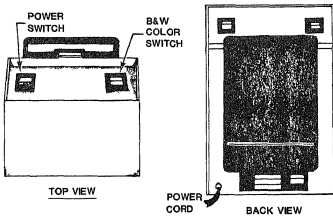
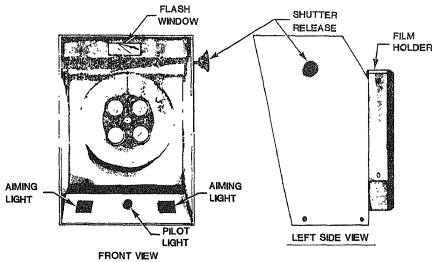
The following equipment necessary for photography is provided:

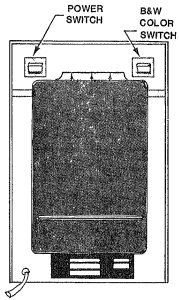
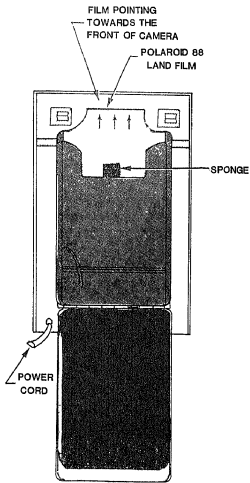
1. Avant instant photo camera and tripod;
2. Polaroid Type 88 Land Film;
3. Four squares of double-sided tape;
4. One 15-foot grounded extension cord;
5. 60-second photograph processing timer;
6. A white poster board, 53 inches long and 36 inches wide.

The following required items should be obtained locally:

1. Measuring tape or ruler;
2. A straight-back, nonswiveling chair with arms; seat should be approximately 18 inches from the floor.

The Avant Camera. The camera supplied by the ICF is the Avant Camera System.





Film. Film supply is the responsibility of each office having a camera. The Avant camera uses Type 88 Polaroid Land Film.

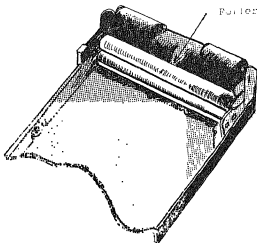
Film Handling. **CAUTION!** Polaroid 88 Land Film uses a caustic jelly that is safely packed inside sealed containers within the cassettes. IF YOU SHOULD ACCIDENTALLY GET SOME OF THIS JELLY ON YOUR SKIN, WIPE IT OFF IMMEDIATELY! To avoid an alkali burn, wash the area with plenty of water immediately.

IT IS PARTICULARLY IMPORTANT TO KEEP THE JELLY AWAY FROM EYES AND MOUTH. Keep the discarded materials out of the reach of children, and out of contact with clothing and furniture, as discarded materials still contain some jelly.

Loading the camera. Load the film according to the instructions below:

1. Open the film holder on the back of the camera by depressing the latch on the right side of the film holder.
2. Carefully tear open the film package and remove the film cassettes. Handle the film cassettes by the edge only.
3. Position the film cassette in the film holder, closed side of the film cassette down and resting on the sponge strip in the film holder. Be sure that the red arrows on the black film tab in the cassette are pointed toward the front of the camera.
4. Making sure that the black film strip is outside of the film holder, close the film holder by pressing the lid until it snaps shut.
5. Pull the black strip straight up and out of the film holder. A white tab will then appear. There are eight tabs in each cassette; each one identifies the number of picture being taken (1 through 8).

Keeping the system clean. When reloading, examine the rollers in the film holder. Use a damp cloth to remove specks or deposits that appear on the rollers as the camera is used. The rollers should be cleaned after each film cassette. Instructions for removing the rollers are inside the film holder next to the rollers.



Using a clean, damp cloth, wipe off the outside of the camera once a week or whenever dust and dirt accumulation makes this necessary.

Selecting a location for photograph collection. In selecting an area for taking the photographs, the following factors should be considered:

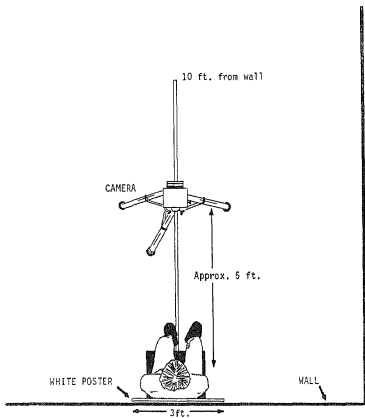
1. The area should be away from the public and should not be one that is generally crowded.
2. The location should permit the easy flow of applicants in and out of the area.
3. The room should be painted in a light color. Dark colors will adversely affect the photographs.
4. The photographing area must be close to a 110V AC electrical outlet (not over 15 to 20 feet).
5. The area should allow a 4 by 10 foot rectangle to be marked off. You will need about 4 feet of space along a light colored wall and about 10 feet in front of the wall.

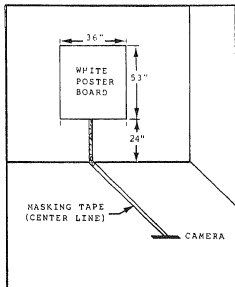
Layout and setup of photographing area.

The photographing area should be laid out as shown. Then proceed as follows to set up the area:

1. Attach the white poster board to the wall, using masking tape. The bottom edge of the poster board should be about 24 inches from the floor.
2. Determine the vertical center of the poster by dividing its width in half. Make a light 1/2 inch long pencil mark at the bottom of the poster board.
3. Once the center is determined, use a yardstick or tape measure and mark the floor. Make sure the poster board is parallel to the floor, so the mark on the floor will be the center point.
4. Extend the masking tape along the floor, 10 feet out from the base of the wall. Be sure the masking tape extends in a straight line, perpendicular to the wall.
5. Position the chair with its back flush against the wall. Be sure that the chair is centered on the posterboard.
6. Verify that you have correctly positioned the chair and the poster board. When the chair is correctly positioned, mark the position of each leg by placing four squares of masking tape on the floor.
7. Position the camera on the line so that the front of the camera is approximately five feet from the subject.

Your layout is now complete, except for the tripod and camera assembly.

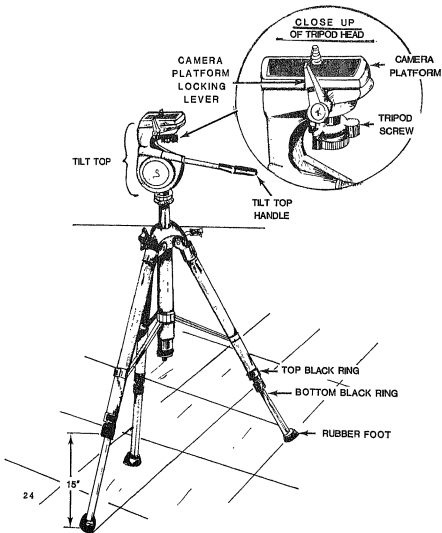




Tripod and camera assembly. Assemble the tripod according to the instructions below.

1. Remove the tripod from the carton. The tripod handle will be in the bottom of the box, wrapped in plastic. Remove the packing plastic from the handle.
2. With the tripod laying on its side on a desk or table, tighten the top "black ring" on each leg. This locks the upper section of the tripod legs in place.
3. Loosen the bottom "black ring". Pull gently on the bottom of each leg and extend each leg 15 inches. This measure is from the bottom of the rubber foot to the bottom of the black ring. Secure the legs in this position by tightening the bottom black ring on each leg. This locks the tripod leg in place.
4. Place the tripod on the floor and spread the legs out as far as possible.
5. Screw the tripod handle into the deepest hole on the tripod head (the hole below the tripod screw).

6. Rotate the "camera platform" until it is even with the tripod head. Tighten the "camera platform locking lever".
7. Place the camera on the tripod by aligning the hole in the bottom of the camera with the small screw in the center of the "camera platform". Place the camera on the tripod.



Camera Trouble Shooting

The following questions and answers are designed to help resolve problems that may arise:

- Q. Is the film still good after it has been in storage a long time and/or the expiration date on the package has passed?
- A. That depends on how "old" the film is and on the conditions under which it was stored. The best advise is to take some sample pictures and view the results.
- Q. Can another color film be used in the Avant Camera beside the Polaroid Type 88 Land film?
- A. No.
- Q. If the picture has little white specks, a yellow dot, or a yellow stain on it, what is wrong?
- A. When little white specks or a yellow dot appears on the picture, this is a sign of dirty rollers. When the film is pulled through, and is not pulled straight up, the film coming through at an angle may cause a chemical substance to saturate the rollers. This will cause a deposit, and that deposit on the rollers will cause a yellow spot on the picture when it comes in contact with the next film. If the deposit goes all the way around the roller, then the yellow stain will appear as a line on the picture. This can be avoided if you check the rollers every time you place the film in the camera. When you notice a chemical deposit, simply remove it with a clean damp cloth.
- Q. What is wrong when the Avant camera fails to flash?
- A. First, look at the back of the camera. On the top right side, there is a switch for B/W or color film. If this switch is on B/W, the camera will not flash. Put the switch on "color". (Tape color switch in "on" position to avoid this problem). Next, check the extension cord. Sometimes the wires are broken inside. If at this time the camera still fails to flash, the flash unit may be burned out. This will require factory repair of the camera.
- Q. Can an external flash be used?
- A. No.

VI. Reporting Requirements

The voluntary agency operating the fingerprint/photographic service will submit their assessment of the costs incurred. Most VOLAGs currently charge \$3 to \$5 for fingerprinting, and \$7 to \$10 for photographs. In some VOLAG programs, different prices are charged based on whether the two or four-lens camera is used and depending on whether the pictures taken are in support of naturalization or other INS benefits.

As part of the contractual agreement reached between the voluntary agency and INS, an annual accounting is made to INS of all services provided, fees charged and the budget for the operation of the program. The district director can request that a more frequent accounting of service and finance reporting be submitted. See Appendices F and G for a sample financial report and contractual agreement.

The VOLAGs offer the fingerprint/photographic service at nominal fee rates. Because the agencies are nonprofit, they can waive or reduce any fees they deem appropriate. For example, if a family of 10 requires each member of the family admission, the cost could be as much as \$150. However, the VOLAG may, at its discretion, reduce or waive the fees according to family income.

It is advisable that VOLAGs maintain statistics of persons served, and that a report with a breakdown of services rendered at the VOLAG desk be submitted periodically to the district office. A sample of statistical reporting is as follows:

VOLAG DESK STATISTICS

July 7 - September 17, 1988
(50 days)

Forms Distribution	13,663	86%
General Information Provided	1,252	8%
Fingerprinting Services	<u>979</u>	<u>6%</u>
TOTAL SERVICES	15,894	100%
Daily Average Number of People Served		<u>318</u>

VII. Procedures for Submission of Proposal by Voluntary Agency

A voluntary agency may submit an unsolicited proposal to the district director, INS at any time. The proposal should meet all specifications outlined in the Federal Register, Vol. 51, No. 194, October 7, 1986 (See Appendix A), and must be submitted by a bona fide nonprofit organization. The proposal should outline all services to be provided and the reports to be submitted to the district director.

The Service may also initiate the VOLAG desk project. This is done by the district director notifying the voluntary agencies in its jurisdiction that the desk project is being considered. Because the contract can be granted at the discretion of the district director, he/she should invite all nonprofit agencies in the area involved in immigration services to submit proposals by a specified date. See Appendix K for a sample letter soliciting proposals from voluntary agencies.

A sample VOLAG proposal is found in Appendix H to help agencies draft their submissions. NOTE: This is only a sample for guidance. Each agency should submit an original proposal based on district office requirements.

In those areas where more than one agency will staff the VOLAG desk in a joint effort, the agencies may submit their proposal jointly, but one VOLAG should be designated as the lead agency in the project. This will pinpoint responsibility in monitoring, supervising and financial reporting.

VIII. INS Processing of Voluntary Counseling Agency Proposal

Once the closing date for proposal submission has been reached, it is recommended that the district director establish a panel consisting of representatives from the Information, Examinations, and Administration units to review the proposals. This would eliminate the appearance of favoritism in selecting an agency to establish the program.

The panel will review all proposals and submit the name of the selected agency to the district director for approval. The selection will be based partly on the agency's past performance, potential to be trained in immigration laws and procedures and proposed services to be rendered.

Upon approval of an agency, the district director should notify the agency of the selection and schedule the signing of an INS/VOLAG agreement (See Appendix G). Agencies not selected should also be notified of the district director's decision and the reasons therefor. A sample notification letter may be found in Appendix L of the manual.

IX. APPENDICES

Appendix A

8 CFR Part 332c

DEPARTMENT OF JUSTICE

Immigration and Naturalization Service

8 CFR Part 332c

Establishment of Photographic Studios

AGENCY: Immigration and Naturalization Service, Justice.

ACTION: Final rule.

SUMMARY: This rule extends the supervision of district directors over photographic studios operated by sponsoring organizations, without profit, in INS facilities. The rule authorizes district directors to provide space to sponsoring organizations to operate photographic services, fingerprinting services, or both. The rule change relates solely to the INS organization and management and has no impact upon the public.

EFFECTIVE DATE: October 7, 1986.

FOR FURTHER INFORMATION CONTACT:

For General Information: Loretta J. Shogren, Director, Policy Directives and Instructions, Immigration and Naturalization Service, 425 I Street NW, Washington, DC, 20536, Telephone: (202) 633-3048.

For Specific Information: E. B. Duarte, Jr., Director, Outreach Program, Immigration and Naturalization Service, 425 I Street, NW, Washington, DC, 20536, Telephone: (202) 633-4123.

SUPPLEMENTARY INFORMATION: This rule extends the supervision of district directors over photographic studios operated by sponsoring organizations, without profit, in INS facilities. The rule authorizes district directors to provide space to sponsoring organizations to operate photographic services, fingerprinting services, or both.

The rule is consistent with the intent of section 332(g) of the I&N Act, 8 U.S.C. 1443(g), which allows the establishment of facilities by sponsoring organizations for the benefit of persons seeking to comply with immigration and naturalization laws. A review by the INS General Counsel of the legislative history of section 332(g) does not show any specific intent to limit the use of facilities to photographic studios.

Since the rule was last amended in 1982, delegating oversight responsibility to the INS regional commissioners and operational supervision to the district directors, photographic and fingerprinting studios have been set up in five district offices. Meanwhile, the INS Outreach Program has received inquiries from other INS district offices and voluntary agencies asking whether fingerprinting services are also covered by the former rule. The change, therefore, clarifies the intent of the rule and enhances the INS supervision of the delivery of services to the public. The change is administrative and relates to INS organization and management.

Compliance with 5 U.S.C. 553 as to notice of proposed rule making and delayed effective date is not necessary because the rule involves INS organization and has no adverse impact on the public.

In accordance with 5 U.S.C. 605(b), the Commissioner of the Immigration and Naturalization Service certifies that this rule will not have a significant impact on a substantial number of small entities since it is limited to the INS organization.

The rule is exempt from the requirements of E.O. 12291 as provided by section 1(a)(3) of the Executive Order because it relates solely to INS organization and management.

List of Subjects in 8 CFR Part 332c.

Citizenship and naturalization.

Accordingly, Chapter I of Title 8 of the Code of Federal Regulations is amended as follows:

PART 332c-PHOTOGRAPHIC STUDIOS

1. The authority citation for Part 332c continues to read as follows:

Authority: Secs. 103 and 332(g), Immigration and Nationality Act, as amended; 8 U.S.C. 1103 and 1443(g).

2. Section 332c.1 is revised to read as follows:

332c.1 Establishment of photographic and fingerprinting studios.

District directors shall after investigation recommend to the appropriate regional commissioner the establishment and operation of studios providing photographic services, fingerprinting services or both. The studios shall be operated by sponsoring organizations on a nonprofit basis solely for the benefit of persons seeking to comply with the

requirements of the immigration and naturalization laws. Such studios must be in a building occupied by the INS and be conducted under the supervision of the district director. Each sponsoring organization shall submit an annual accounting of the conduct of each studio to the regional commissioner through the district director.

Dated: October 7, 1986.

H. F. Sylvester, Associate Commissioner, Management, Immigration and Naturalization Service.

[FR Doc. 86-22719 Filed 10-6-86; 8:45 am]

Billing Code 4410-10-M

Appendix B

8 USC 1443 (g)

8 USC 1443 (g)

NATURALIZATION

Furnished quarters for photographic studios

(g) The officers in charge of property owned by the Government are authorized, upon the recommendation of the Attorney General, to provide quarters, without payment of rent, in any building occupied by the Service, for a photographic studio, operated by welfare organizations without profit and solely for the benefit of persons seeking to comply with requirements under the immigration and nationality laws. Such studio shall be under the supervision of the Attorney General.

June 27, 1952, c. 477, Title III, ch. 2, subsection 332, 66 Stat. 252.

Appendix C

Administrative Manual 2821.01

PHOTOGRAPHIC STUDIOS

1. Purpose. To provide instructions for the photographic studios provided for by 8 CFR 332c.1.
2. Reports and Analysis - RCSCADM - 310
 - a. Welfare organizations having photographic studios in INS offices will submit an annual accounting to the regional commissioner through the district director to furnish information on compliance with 8 CFR 332c.1. This accounting will include:
 - (1) Name of the welfare organization sponsoring the studio.
 - (2) Name of the local executive officer and local address of welfare organization.
 - (3) Total number of applicants photographed during the calendar year.
 - (4) Cost to applicant, if any, of photographs furnished.
 - (5) An accounting of expenses, salaries, and proceeds of the operation for the year if applicants are required to pay for photographs.
 - b. District Directors - Will examine the reports of the welfare organizations and forward them to the Regional Commissioner with a covering memorandum stating the extent of compliance by the sponsoring organization with the provisions of 8 CFR 332c.1 and any serious complaints against the operation of the studio which come to his or her notice.
 - c. Regional Office - The regional office will review the report and the district director's comments, compare them with prior year reports and comments for the same location, and determine if recommendations concerning the operations are necessary. If recommendations are necessary, the regional office will forward the report, the recommendations and the action to be taken to the district director.
 - d. Reports Retention - The reports and related comments will be retained for five years for analytical purposes.

3. Space Authorization - Authorization for assignment or modification of space for use by photographic studios must be in accordance with the requirements of the 3100 section of the Administrative Manual.

Appendix D

Administrative Manual 3003.01
(TM 797 dated January 23, 1980)

Proposed Repairs, Alterations and Modifications

1. Purpose: It is the purpose of this section to establish policy and procedures relating to the expenditure of funds and the approvals associated with repairs, alterations and modifications.

Before any repair, alteration or modification project is undertaken, prior approval at the Regional Office and/or Central Office is required as defined in the procedures stated below. This applies to all projects whether they are in INS owned or leased facilities or in GSA owned or leased facilities.

2. Policy: For projects that involve repairs, alterations and modifications the Regions are authorized to expend repair and alteration (R&A) funds, that have been allocated through the budget process, to the extent of \$5,000 without prior approval of the Central Office. In cases of emergencies, where funds are required over the \$5,000 level of authorization, authority for the work shall be requested of COENG by telephone. Under those circumstances, Form G-68 shall be submitted for post approval.

All new construction or projects which increase assignable square footage, no matter what the costs, require prior approval of the Central Office.

The authorization document for repair, alteration and modification projects shall be the Form G-68, Request for Authorization to Undertake Construction Improvement or Alterations.

3. Definitions:

New Construction: Projects that require an increase of or new square footage, new or replacement fencing projects and construction of driveways and parking facilities or planning of complete complexes.

Repair, Alteration and Modification Projects: Refers to all installations including, but not limited to, general office and special purpose space, border inspection stations, border patrol stations, detention facilities, residences, garages, radio stations and appurtenances, repeater stations, airport inspection facilities, existing driveways, existing parking areas and any adjunct facilities. The projects include day-to-day maintenance service, interior painting, or general improvements.

Procedure: A Form G-68, in quadruplicate, supported by memorandum which defines and justifies the project outlining proposed modification, alteration or repairs, shall be submitted to the Regional Associate Commissioner, Management, for approval and processing. If request is above the \$5,000 limit, the Form G-68 shall be forwarded to the Associate Commissioner, Management, Attn: Chief, Facilities and Engineering Branch.

Appendix E

Legal Opinion No. 81-1

Proposed Agreement for the Establishment of
a Photograph and Fingerprint Studio at the
Houston District Office

January 6, 1981

Charles C. Sava, Acting
Associate Commissioner, Management

Paul W. Schmidt
Acting General Counsel

You have asked this office to comment on whether a proposed agreement for the establishment of a studio in the Houston District Office to provide for the taking of fingerprints and photographs for a fee is permissible under 8 C.F.R. 332c.1. As you point out in your memorandum, the particular section of 8 C.F.R. only addresses photograph studios. This agreement would result in an extension of the concept to provide space also for the taking of fingerprints. You further question whether it is appropriate for the Service to commit itself to an agreement that does not have a date certain for termination.

The establishment of a fingerprint studio by a non-profit organization would extend the application of 8 C.F.R. 332c.1. We see no legal prohibition to the establishment of such a studio. Such a facility appears to be consistent with the intent of section 332(g) of INA Act, 8 U.S.C. 1443(g), which allows for the setting up of facilities by welfare organizations for the benefit of persons seeking to comply with the Immigration and Naturalization laws. Our review of the legislative history of section 332(g) does not show any specific intent to limit the use of facilities to photographic studios. It is doubtful that at the time the section was implemented any thought was given to the specific problem of fingerprint facilities.

If implemented on a national basis, the regulation should be amended to take into account the setting up of fingerprint facilities as well as photographic facilities for non-profit organizations. As stated in 8 C.F.R. 332c.1, its purpose is to facilitate the process of "persons seeking to comply with the Immigration and Naturalization laws". The setting up of a fingerprint facility would be consistent with such an intent, as long as it is conducted under the supervision of the Commissioner.

we do however suggest that prior to allowing such an organization to take fingerprints which will be subsequently used by the Service, and possibly by other law enforcement agencies, we should determine what security precautions have been taken. For example, there should be some mechanism to assure INS that an employee of the Immigration Counseling Center will not be able to provide INS with a set of fingerprints other than those of the individual who is applying for a benefit.

As we do not see any legal bar to the setting up of such a facility, a policy decision must be made as to whether or not the Service wishes to allow for such a function. The Houston facility can either be an experiment, or it can represent a new national policy. If it is to be a new national policy, a notice of a proposed change in the regulation should be prescribed in the Federal Register.

Regarding the period of time of the contract, the Service should not commit itself to the amendment of paragraph one. The contract should be drafted with a date certain for termination, with an option to renew if agreed upon by both parties, and procedures for terminating the contract when either party so desires.

If you have any questions regarding the contents this memorandum, please contact Mr. William P. Joyce of my staff.

Appendix F

Sample Financial Statement

SAMPLE FINANCIAL STATEMENT

The following is a sample financial report outlining potential income and expenses incurred by a voluntary agency in a desk project. As you can see, the project may transfer funds to its immigration department provided reporting of such is submitted to the Service.

In the first sample, a transfer of \$37,155.71 is shown as being made to the immigration department of the voluntary agency. In the second example, the same \$37,155.71 is shown as a revenue of the agency's immigration department.

Both financial reports are required to show the flow of funds and the maintenance of nonprofit status by the agency.

PHOTO DEPARTMENT

JANUARY - DECEMBER 1988

REVENUE

3,906	ADITS	27,342.00
1,176	2 x 2	10,584.00
4,626	Fingerprints	<u>10,702.00</u>
<u>TOTAL REVENUE</u>		48,628.00

EXPENDITURES

Salaries	8,615.32
Payroll Taxes	577.27
Benefits	84.23
Photo Supplies	7,654.10
Bookkeeping Fee	300.00
Photo Equipment (camera, fingerprinter)	<u>1,312.00</u>
<u>TOTAL EXPENDITURES</u>	18,542.92

<u>ENDING BALANCE</u>	December 31, 1988	30,085.08
-----------------------	-------------------	-----------

<u>BEGINNING BALANCE</u>	January 1, 1988	<u>9,837.05</u>
		39,922.13

FUNDS TRANSFERRED TO THE VOLAG'S

<u>IMMIGRATION DEPARTMENT</u>	37,155.71
-------------------------------	-----------

<u>PROGRAM BALANCE</u>	2,766.42
------------------------	----------

VOLUNTARY AGENCY
IMMIGRATION DEPARTMENT

January - December 1988

REVENUE

Archdiocese	19,999.29
Fees for Service	21,351.95
Photo Department	<u>37,155.71</u>
<u>TOTAL REVENUES</u>	78,506.95

EXPENDITURES

Salaries	36,694.18
Payroll Taxes	2,458.61
Benefits	7,451.21
Equipment	994.00
Bookkeeping	300.00
Office Supplies	2,826.06
Subscriptions	1,236.19
Mileage	3,882.81
Telephone	5,939.48
Occupancy	729.79
Conference	1,331.83
Organizational Dues	20.00
V.E.S.S. - Stipend	11,554.68
Archdiocese Lay Pension	2,318.04
Postage	<u>770.07</u>
<u>TOTAL EXPENDITURES</u>	78,506.95

ENDING BALANCE

- 0 -

APPENDIX G

Sample Contractual Agreement

AFFILIATION AGREEMENT

WHEREAS, the _____ (hereinafter referred to as _____) is a non-profit corporation organized and existing under the laws of the State of _____, having its principal office at _____.

WHEREAS, the United States Immigration and Naturalization Service (hereinafter referred to as INS) is a section of the United States Department of Justice, Washington, DC, with a district office at _____.

AND WHEREAS, _____ and the INS are desirous of entering into a relationship of mutual support and cooperation to provide fingerprint, photographic and forms distribution services to INS clients.

NOW, THEREFORE, _____ and INS for valuable consideration, agree to the following terms and conditions:

1. Period of Agreement. This agreement will be through _____ and shall automatically renew itself in increments of one year from year to year thereafter unless and until either party shall give thirty (30) days written notice of termination to or on each other. Said notice shall be computed commencing with the day after the date of mailing and will continue until proper notice is initiated by _____ or INS.

2. Authorized Offerings. Under the conditions stated in this agreement, _____ will offer fingerprint, photographic and forms distribution services to INS clients in the Public Information Room of the INS district office. The INS will provide gratis office space and appropriate materials in order to deliver said service according to INS standards. INS will provide appropriate staff training in order to assure compliance to INS fingerprint, photographic, and forms distribution service standards; _____ will provide adequate personnel and all direct operational expenses, except for office space and official INS material.

3. Compensation of _____. As consideration for the services provided, _____ will set nominal fees with the concurrence of the district director and will reflect actual expenses incurred by _____.

4. Financial Reports. The _____
will provide quarterly reports to the district director and will
provide an annual report in the same manner.

SIGNED: _____ SIGNED: _____

FOR THE IMMIGRATION AND
NATURALIZATION SERVICE: _____

DATE: _____ DATE: _____

APPENDIX H

Sample VOLAG Proposal

Dear District Director:

The agency has reviewed your letter of May 9, 1988, with the appropriate staff and volunteers. After much discussion, the Board of Directors of the agency has authorized me to submit this project regarding the provision of fingerprints, photographic, information and form distribution to INS clients in the INS Building at its monthly Board Meeting held Tuesday, May 20, 1988.

Attached is the proposal and all pertinent data regarding this project and our agency.

Please call me if you have any questions regarding this submission. Thank you for your attention in this matter.

Sincerely,

Executive Director

MBO: lds

PROPOSAL FOR THE ESTABLISHMENT OF FINGERPRINT/PHOTOGRAPH
STUDIOS AT IMMIGRATION AND NATURALIZATION SERVICE OFFICES

A bona fide nonprofit organization interested in providing fingerprint, information, and form distribution services to persons seeking to comply with the requirements of the immigration and nationality laws, may submit a written proposal to the district director of an Immigration and Naturalization Service office having jurisdiction over their area.

The following outline is designed to serve as a guide in the drafting of the proposal. Each organization should submit its own original proposal outlining the services to be provided in conformance with the needs of the specific Service district office.

I. INTRODUCTION OF ORGANIZATION

A. Type of Organization

1. IRS tax exempt;
2. History of organization;
3. Location of organization and/or satellites;
4. Length of service in the community;
5. Accreditation by United States Board of Immigration Appeals, and names of accredited representatives;
6. Number and qualifications of staff.

II. OBJECTIVES

A. Services to be Provided

1. Fingerprints;
2. Photographs;
3. Information Services;
4. Forms distribution;
5. Photocopying;
6. Notary services.

B. Detailed Program

1. Work schedules;
2. Fee schedules;
3. Equipment.

APPENDIX I

Instructions for Taking Fingerprints

INSTRUCTIONS FOR TAKING FINGERPRINTS

The taking of accurate fingerprints is crucial to the processing of applicants for immigration benefits. Most INS applications require that applicants between the ages of 14 and 79 inclusive be fingerprinted if physically possible.

The fingerprints taken at the time of data collection must be sharp and clean. The ridge lines must be sufficiently dark and clearly defined to be accurately classified and filed by the FBI Identification Division. The card will be returned if one or more fingerprints on a card are found too indistinct to interpret. Failure to take legible prints will result in unnecessary processing delays.

APPLICANT DATE OF BIRTH: _____ PLACE OF BIRTH: _____ SEX: _____ OCCUPATION: _____ ADDRESS: _____ CITY: _____ STATE: _____ ZIP: _____	TYPE OR PRINT ALL INFORMATION IN BLACK (PRINT NAME) DOA		(DATE) _____		(1) LEAVE BLANK
	(2) LEAVE BLANK		(3) LEAVE BLANK		(4) LEAVE BLANK
(5) LEAVE BLANK		(6) LEAVE BLANK		(7) LEAVE BLANK	
(8) LEAVE BLANK		(9) LEAVE BLANK		(10) LEAVE BLANK	
(11) LEAVE BLANK		(12) LEAVE BLANK		(13) LEAVE BLANK	
(14) LEAVE BLANK		(15) LEAVE BLANK		(16) LEAVE BLANK	
(17) LEAVE BLANK		(18) LEAVE BLANK		(19) LEAVE BLANK	
(20) LEAVE BLANK		(21) LEAVE BLANK		(22) LEAVE BLANK	
(23) LEAVE BLANK		(24) LEAVE BLANK		(25) LEAVE BLANK	
(26) LEAVE BLANK		(27) LEAVE BLANK		(28) LEAVE BLANK	
(29) LEAVE BLANK		(30) LEAVE BLANK		(31) LEAVE BLANK	
(32) LEAVE BLANK		(33) LEAVE BLANK		(34) LEAVE BLANK	
(35) LEAVE BLANK		(36) LEAVE BLANK		(37) LEAVE BLANK	
(38) LEAVE BLANK		(39) LEAVE BLANK		(40) LEAVE BLANK	
(41) LEAVE BLANK		(42) LEAVE BLANK		(43) LEAVE BLANK	
(44) LEAVE BLANK		(45) LEAVE BLANK		(46) LEAVE BLANK	
(47) LEAVE BLANK		(48) LEAVE BLANK		(49) LEAVE BLANK	
(50) LEAVE BLANK		(51) LEAVE BLANK		(52) LEAVE BLANK	
(53) LEAVE BLANK		(54) LEAVE BLANK		(55) LEAVE BLANK	
(56) LEAVE BLANK		(57) LEAVE BLANK		(58) LEAVE BLANK	
(59) LEAVE BLANK		(60) LEAVE BLANK		(61) LEAVE BLANK	
(62) LEAVE BLANK		(63) LEAVE BLANK		(64) LEAVE BLANK	
(65) LEAVE BLANK		(66) LEAVE BLANK		(67) LEAVE BLANK	
(68) LEAVE BLANK		(69) LEAVE BLANK		(70) LEAVE BLANK	
(71) LEAVE BLANK		(72) LEAVE BLANK		(73) LEAVE BLANK	
(74) LEAVE BLANK		(75) LEAVE BLANK		(76) LEAVE BLANK	
(77) LEAVE BLANK		(78) LEAVE BLANK		(79) LEAVE BLANK	
(80) LEAVE BLANK		(81) LEAVE BLANK		(82) LEAVE BLANK	
(83) LEAVE BLANK		(84) LEAVE BLANK		(85) LEAVE BLANK	
(86) LEAVE BLANK		(87) LEAVE BLANK		(88) LEAVE BLANK	
(89) LEAVE BLANK		(90) LEAVE BLANK		(91) LEAVE BLANK	
(92) LEAVE BLANK		(93) LEAVE BLANK		(94) LEAVE BLANK	
(95) LEAVE BLANK		(96) LEAVE BLANK		(97) LEAVE BLANK	
(98) LEAVE BLANK		(99) LEAVE BLANK		(100) LEAVE BLANK	

The applicant's fingerprints are recorded on Form FD-258. The eight (8) by eight (8) inch card is placed in a cardholder to facilitate the fingerprinting. The card must contain the applicant's complete personal data (i.e., name, address, date and place of birth, sex, race, height and weight). The card must be signed by the applicant in the presence of the technician taking the fingerprints. INS offices with volag desks should insure the project is stocked with sufficient forms.

Recommended Techniques

An accurate fingerprint classification is very important. It is necessary that each focal point (cores and all deltas) be clearly printed in order to obtain accurate ridge counts and tracings. Each finger must be inked evenly from the tip to below the first joint by separately rolling or pressing on the inking surface then placed on the fingerprint card in exactly the same manner.

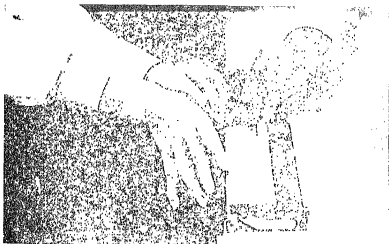
The degree of pressure used in the inking and printing process is very important. The applicant should be advised to relax and refrain from looking at the hands or trying to help the technician by exerting pressure.

The technician should stand to the left of the applicant when printing the applicant's right hand and to the right of the applicant when printing the left hand. The fingers should be held securely and not allowed to slip or twist to avoid smears, blurs and false appearing patterns.

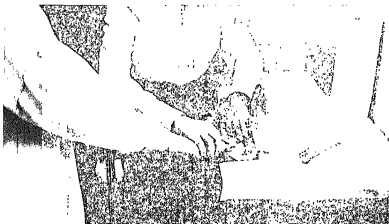
Types of Fingerprints

There are basically two types of fingerprint impressions - "rolled impressions" and "plain impressions."

The "rolled impressions" are the upper ten (10) prints on the fingerprint card which are taken individually in the following order: thumb, index, middle, ring, and little fingers of each hand. The right hand is printed first followed by the left hand. Each finger is inked and printed separately by rolling the finger away from the applicant's body. The thumb is rolled towards the applicant's body. The finger should be lifted upward upon completion of the roll so that the edge of the impression will not be smudged. The resulting image is squarish in shape.



Rolled Impressions

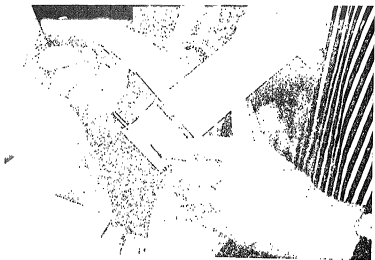


Plain Impressions

The smaller "plain" impressions at the bottom of the card are taken by simultaneously printing the four fingers of each hand and the thumb without rolling. The right thumb is inked first by pressing straight down on the inking surface and then pressing lightly in the space provided on the card. The four fingers of the right hand are then simultaneously inked and pressed straight down directly on the lower corner of the card in the space provided. The same procedure is followed in printing the left hand.

Special Handling

Certain situations may require special fingerprinting techniques. The use of special inking devices may help in obtaining legible prints. Deformities, crippled fingers, missing fingers at birth, and amputations may require special handling.



Special Printing Device (curved holder)

The conditions of the fingers may also be affected by the advanced age or occupation of the applicant. By using a very small amount of ink on the inking surface, legible fingerprints may be obtained in these difficult situations.

It is very important that the appropriate notations concerning the specific abnormality be marked on the fingerprint card.

Fingerprinting Equipment

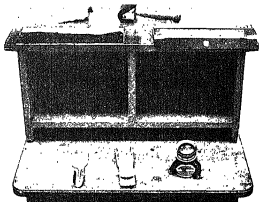
Chapter Five of this manual describes two types of equipment used for taking fingerprints - the Print-Master Fingerprint Inker and the Porelon Fingerprint Pad.

A third medium is the Ink Plate and Roller method. This method requires more skill but the prints obtained are clearer and sharper.

The basic equipment consists of:

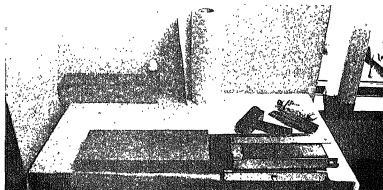
- . Fingerprint stand
- . Inking plate
- . Printer's ink (heavy black paste)
- . Roller
- . Cardholder

This equipment is simple to operate, inexpensive, and may be purchased from fingerprint supply companies.



Fingerprint Stand

The fingerprint stand measures about two (2) feet in length, one (1) foot in width and height. It contains a cardholder, a chrome strip which is used as the inking plate, and two compartments for storing blank fingerprint cards and supplies. Denatured alcohol, commercially available cleaning fluids, or pads and necessary cloths should be part of the equipment so that the applicant's fingers may be cleaned before printing and the inking plate cleaned after using. The fingers should be completely dry and free of lint before inking.



Inking Plate

An inking plate may be made from a hard, rigid, scratch-resistant metal plate six (6) inches by 14 inches long, or by inlaying a block of wood with a piece of glass $\frac{1}{4}$ of an inch thick, six (6) inches wide, and 14 inches long. A glass plate by itself would be suitable but should be fixed to a base to prevent breakage.

The inking plate may be placed on the edge of a counter or a table of counter height allowing the applicant's forearm to assume a horizontal position when the fingers are being inked.

This avoids accidental strain or pressure on the fingers and procures more uniform impressions. Also, the applicant's fingers which are not being printed should be made to "swing" off the table to prevent their interfering with the inking process. Each finger must be inked evenly from the tip to below the first joint.

Printer's Ink and Roller

A small daub of printer's ink should be placed on the inking plate or glass. A roller that is about six (6) inches long and two (2) inches in diameter may be used for spreading the ink. The ink is thoroughly spread by lifting the roller off the plate after each stroke and returning to the starting point. This motion is repeated until a very thin film of ink has formed. This small amount will suffice for several sets of prints. The best results will be obtained by using heavy black printer's ink, which should not be thinned before using. This ink will dry and will not blur or smear with handling. Too much ink will obliterate or obscure the ridges. Insufficient ink will result in ridges too light and faint to be counted and traced.

Stamp pad ink, ordinary writing ink, or other colored inks are not suitable for use in fingerprint work as they are too light or thin and do not dry quickly.

It is important that good quality materials be used.

NOTE: Excerpts taken from article published by the Federal Bureau of Investigation, U.S. Department of Justice, entitled "Techniques for Taking Good Fingerprints" reprinted from the FBI Law Enforcement Bulletin, February 1976 (Revised July 1981)

APPENDIX J

Photograph Instructions

Photograph Instructions

Two color photos taken against a white background are required. Photos must be glossy, unretouched and not mounted; dimension of facial image should be about one inch from chin to top of hair. Subject should be shown in three-fourths view showing right side of face with right ear visible. Except, when the right ear is missing or right side of face is disfigured, the left side of applicant may be photographed. The left side of the camera card is then marked that the subject's right side is disfigured. Using pencil or felt pen, lightly print name (and alien registration number, if known) on the back of each photograph.

Photograph size illustration.

The Immigration Card Facility (ICF) will cut the alien's photo to this size for use in card production. Photos that are too large will be returned to the office of jurisdiction.

Instructions for Taking Photograph.

At some Service offices, cameras are available at the VOLAG desk to enable the processing office to obtain the applicant's photograph if the alien has not supplied the required photographs. It should be pointed out that only selected locations have cameras for this purpose. The camera originally supplied may be the Avant camera.

Most Avant cameras have lenses preset to certain "f" stops over a wide range of settings. These cameras carry a silver tag identifying this modification. The "f" stops on these modified cameras should not be changed. If an office has reason to believe the settings have been changed, please contact the Immigration Card Facility to verify the settings and/or receive instructions as to re-setting the "f" stops.

REMEMBER! The smaller the "f" stop number, the more light that goes through the lens; the higher the number, the less light goes through the lens.

Focusing the camera.

It is best to focus the camera with the applicant sitting in place but not rigidly positioned. Ask the applicant to sit in location and to look at the camera. Pose the applicant approximately as required for the photograph.

To set the camera, proceed as follows:

1. With the camera power on, two "aiming" lights approximately 1 inch long will be projected. These

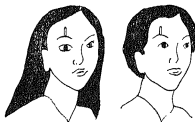
lights are used to ensure that the camera is in focus and is properly aligned.

2. If two lights appear on the applicant's face, then the photograph will be out of focus. Move the camera tripod away or toward the applicant until the two lights come together to form one light image. The photograph will then be in focus. In some cases, the focus lights cannot be seen on a light complexion. Therefore, take a sheet of paper and place it directly in front of the applicant's face to determine if the camera is in focus.
3. The single light image should be shining on the right side of the applicant's forehead--centered over the right eyebrow.
4. If the light image is not properly positioned, tilt the camera slightly until the light hits the correct spot.

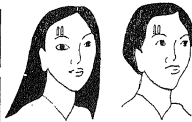
The camera can be tilted by loosening the tripod head handle slightly and gently moving the camera using the tripod head handle. When the proper camera position is attained, retighten the tripod head handle.

5. When the camera is positioned so that one light image shines on the right side of the applicant's forehead, about 1/2 inch above the right eye, the focus is correct.

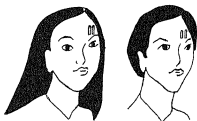
If the voluntary agency has already purchased its own camera, instructions about operating the camera should be obtained from the camera distributor. Some distributors will provide extensive training in operating their cameras for quality pictures.



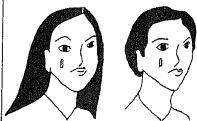
FOCUS: YES
ALIGNMENT: YES



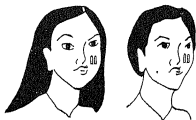
FOCUS: NO-TWO LIGHT IMAGES
ALIGNMENT: YES



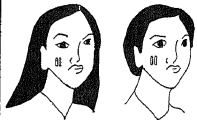
FOCUS: NO-TWO LIGHT IMAGES
ALIGNMENT: NO-TOO FAR TO THE
LEFT



FOCUS: YES
ALIGNMENT: NO-TOO LOW



FOCUS: NO-TWO LIGHT IMAGES
ALIGNMENT: NO-TOO LOW AND
TOO FAR TO LEFT



FOCUS: NO-TWO LIGHT IMAGES
ALIGNMENT: NO- TOO LOW

APPENDIX K

Sample District Director Letter
Soliciting Proposals

UNITED STATES DEPARTMENT OF JUSTICE
IMMIGRATION AND NATURALIZATION SERVICE

Dear Agency Director:

The Service has only recently authorized field offices the opportunity, through voluntary agencies, to operate photographic studios in the space occupied by our agency. The purpose of this provision is to offer aliens a convenience and a reasonably priced service which will serve their best interest and that of INS.

In order to participate, we are asking each of the recognized voluntary agencies in the area to submit a proposal or bid, if you prefer, as to the service that you will perform and the rates that you will charge. In addition to the photographs, the agency is being asked to fingerprint those aliens as required for an additional fee.

The Service will furnish the space, fingerprinting equipment, training, and all related supplies. Charges for these services, based on local rates, range from \$2.00 to \$6.00 per photo and \$2.00 to \$5.00 per fingerprint chart. The latter is a range of prices gathered from local police agencies.

Any profits derived from these services must be funneled into the general nonprofit services provided by the participating voluntary agency.

If interested, please submit your bid or proposal to this office by (month/day/year). The option will be awarded by (month/day/year).

Should you have any questions in this regard, please call

Sincerely,

District Director

P.S. The average number of persons being photographed per day on the premises is 10; fingerprinted, 15. Minimum number of photos is 2. There are, of course, substantially more persons that could be reached, providing the rates are reasonably set.

APPENDIX L

Sample Notification of Agency Selection

UNITED STATES DEPARTMENT OF JUSTICE
IMMIGRATION AND NATURALIZATION SERVICE

Dear Agency Director:

Thank you for your letter of June 11, 1988, which included a proposal to provide fingerprinting, photographic and forms distribution in the INS Federal Building. We solicited all of the voluntary agencies listed by the Immigration and Naturalization Service in _____ for these proposals and received a number of bids. These bids were considered by a committee in the INS office and then forwarded immediately for my decision.

The proposals submitted were clear, complete and very similar in nature. I have awarded the contract, however, to another voluntary agency. The decision was extremely difficult because there is no question that your agency could provide excellent service to our clientele. I appreciate the continued cooperation you give to our office and the professional treatment your adjustment of status cases receive. I look forward to continuing the mutually beneficial relationship that has developed over the years.

Very truly yours,

District Director